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Company SPENCER SANE WHITE & BROWN		Company EMERGENCY SUPPORT SECTION	
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4510002/1

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11 <input type="checkbox"/> YOUR PACKAGING \$1 <input type="checkbox"/>		2 <input checked="" type="checkbox"/> DELIVER WEEKDAY								<input type="checkbox"/> Return Shipment	<input type="checkbox"/> Third Party <input type="checkbox"/> Chg To Del <input type="checkbox"/> Chg To Hold									
16 <input checked="" type="checkbox"/> FEDEX LETTER * 56 <input type="checkbox"/> FEDEX LETTER *		3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations)										Street Address								
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Economy Service (Formerly Standard Air) (Delivery by second business day)	Heavyweight Service (For Extra Large or any package over 150 lbs)	7 <input type="checkbox"/> OTHER SPECIAL SERVICE														Release Signature Date/Time				
30 <input type="checkbox"/> ECONOMY SERVICE	70 <input type="checkbox"/> HEAVYWEIGHT **	8 <input type="checkbox"/>															REVISION DATE 11/89 PART #119501 EXEM 12/89 FORMAT #014 014 © 1989 F.E.C. PRINTED IN U.S.A.			
80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT **		9 <input type="checkbox"/> SATURDAY PICK-UP (if extra charge)																FedEx Emp. No.		
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OF COUNSEL

* ADMITTED IN KANSAS
** ADMITTED IN KANSAS AND MISSOURI
ALL OTHERS ADMITTED IN MISSOURI

PLEASE REPLY TO THE MISSOURI OFFICE
FILE NO.

WRITER'S DIRECT DIAL NUMBER IS:

March 15, 1990

Federal Express

Ms. Ruth Mancos
Emergency Support Section
U.S. Environmental Protection Agency, 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604

Re: Supplemental Response to Request for Information
Pursuant to Section 104(e) of CERCLA and Section 3007
of RCRA, for the Conservation Chemical Company of
Illinois Site in Gary, Indiana

Dear Ms. Mancos:

We are attorneys for American Telephone and Telegraph
Company ("AT&T"), successor in interest to Western Electric
Company, Incorporated ("Western Electric"). (See paragraph III.
8 below.)

The Environmental Protection Agency ("EPA") sent two
identical letters dated January 30, 1990 addressed to Western
Electric requesting information regarding Western Electric's
dealings with the Conservation Chemical Company of Illinois site
in Gary, Indiana. One letter was sent to a Western Electric
address in Richmond, Virginia ("the Richmond facility"). The
other letter was sent to a Western Electric address in Winston-
Salem, North Carolina ("the Winston-Salem facility"). On
February 28, 1990, we hand delivered to Ms. Mary Fulghum AT&T's
response to the portion of the information requests relating to
PCBs. See Subparagraph I.B.(ii) below. This letter supplements
AT&T's February 28, 1990 response. See subparagraphs I.B.(iii)
and I.C. below. The affidavit of Judy McCarthy is attached
hereto as Attachment I.

Page 2

I. Limitations on Scope of Inquiry and Response. On February 15, 1990 the undersigned discussed with Ms. Mary Fulghum, EPA legal counsel, the scope of the requests for information. Ms. Fulghum agreed to the following interpretations of and limitations on the requests:

A. The information requested by the January 30, 1990 letters is limited to Western Electric's dealings with the Gary, Indiana facility ("the CCCI Site" or "the site") of Conservation Chemical Company of Illinois ("CCCI") except as noted in subparagraph B(ii) below.

B. Although the information requests principally seek information about possible transportation of PCB oils to the CCCI Site, the requests cover all "hazardous substances." Ms. Fulghum, while acknowledging the primary emphasis of EPA's current inquiry to be PCBs, confirmed EPA's intention to request information at this time regarding any "hazardous substances" which might have been transported to the CCCI Site. Ms. Fulghum agreed that a company-wide search for all information regarding use, purchase, storage, treatment, disposal, transportation or other handling of any hazardous substances or materials during the period 1970 to 1985 is beyond the intended scope of the information requests. Ms. Fulghum and the undersigned, therefore, agreed to the following interpretation and modification of the information requests:

(i) Facility Addressed. Each facility addressed is required to respond only with respect to its own operations, and is not responsible for responding on behalf of any other Western Electric or AT&T facility. (Because the Winston-Salem facility merely served as the central billing facility for the Greensboro Shops, the Winston-Salem facility responds only with respect to the Greensboro Shops. See paragraph 7 below.)

(ii) PCBs. Each facility will provide information regarding its use, purchase, storage, treatment, disposal, transportation or other handling of PCBs, without regard to whether the PCBs were transported to the CCCI site.

(iii) Other Hazardous Substances or Materials. With respect to all hazardous substances or materials other than PCBs, each facility addressed may limit its response to its use, purchase, storage, treatment, disposal, transportation or handling of hazardous substances or materials which may have been transported to the CCCI Site.

Page 3

C. Time for Response. Ms. Fulghum and the undersigned agreed that, with respect to the PCB information referred to in subparagraph B(ii) above, each facility addressed will respond within 25 days of its receipt of EPA's letter. With respect to information referenced in subparagraph B(iii) above, however, each facility shall have a 15-day extension of time to respond.

D. Financial Responsibility. Ms. Fulghum agreed that, until further notice from EPA, each facility addressed may respond to the requests for information regarding financial responsibility (requests number 8 through 12) by providing a copy of AT&T's most recent annual report to shareholders.

II. Objections to Instructions. AT&T objects to the instructions which accompany the information requests to the extent that they purport to require AT&T to provide documents or information in the possession, custody or control of former employees, agents, servants, contractors or employees.

AT&T went through the largest corporate reorganization in American history commencing in 1982. The reorganization included the divestiture of 22 former wholly-owned subsidiaries, and the reorganization of Western Electric Company, Incorporated's operations and its name change to AT&T Technologies, Inc. AT&T searched records it considered likely to contain information relating to the EPA's request, and similarly has interviewed those employees it considered likely to provide such information, but cannot categorically state that it has not inadvertently overlooked some piece of information that the EPA might consider responsive to its request or that might cause AT&T to supplement, modify or correct the answers to this request. Accordingly, AT&T reserves the right to supplement, modify or correct the responses provided below. Documents that are subject to lawyer/client communications privilege, attorney work product immunity or otherwise are privileged or protected have not been produced.

III. Response to Requests. The Richmond facility and the Winston-Salem facility (Greensboro Shops) each respond to the information request received by it as follows:

1. Persons Consulted. The persons consulted in preparation of the answers to the information requests were:

Page 4

For the Richmond Facility:

Robert Owens
Senior Engineer
AT&T Richmond Works
4500 South Laburnum Avenue
Richmond, Virginia 23231

For the Winston-Salem Facility (Greensboro Shops):

Henry Campbell
Senior Plant Engineer
AT&T North Carolina Works
3300 Lexington Road, S.E.
Winston-Salem, North Carolina 27104

Frank Worden
Environmental Health Consultant
AT&T North Carolina Works
3300 Lexington Road, S.E.
Winston-Salem, North Carolina 27104

2. Documents. Documents which form the basis for each facility's response are as follows:

Richmond Facility. A description of the documents is attached as Attachment II. Copies of the documents themselves, marked as Exhibits R1 through R14, accompany this letter.

Winston-Salem Facility (Greensboro Shops). A description of the documents is attached as Attachment III. Copies of the documents themselves, marked as Exhibits G1 through G60, accompany this letter.

3. Other Persons. We know of no AT&T employees, contractors or agents who may be able to provide a more detailed or complete response than contained herein. Mr. Norman Hjersted, the owner and principal officer of CCCI, may be able to provide you additional information. We have not been in contact with Mr. Hjersted and do not know his current address.

4. EPA Identification Numbers. The EPA identification numbers for each facility addressed are as follows:

Richmond Facility, VAD066000993
Winston-Salem Facility, NCD003213907

Page 5

Greensboro Shops, None (No EPA identification number was assigned because the shops closed before RCRA regulations requiring such identification numbers were enacted.)

5. Acts or Omissions of Other Persons. AT&T objects to the broad, vague scope of this request, which does not identify the release or threat of release to which it refers, the facility or site to which it refers, the hazardous substance to which it refers, or even the company to which it refers. AT&T makes no response to this inquiry to the extent it may be construed to require AT&T to identify acts or omissions of third parties. AT&T is aware that a large body of evidence has been accumulated by EPA with respect to CCCI's operation of the site. AT&T refers EPA to its own files for this information.

6. Persons Having Knowledge. AT&T objects to the overbroad scope of this request. Persons identified in paragraph III.1 above and in the documents submitted herewith have knowledge or information about the generation, transportation, treatment, disposal or handling of hazardous substances or materials. It is not possible, however, for AT&T to identify "all persons" having such knowledge.

7. Handling of Hazardous Substances or Materials Which May Have Been Transported to the CCCI Site:. The Winston-Salem facility never had any dealings with CCCI or its sister company, Conservation Chemical Company (CCC), except to serve as a billing center on behalf of the Greensboro Shops. (See Affidavit of Robert Flanagan, attached to my letter to you of February 28, 1990.) Accordingly, AT&T's response to EPA's letter addressed to the Winston-Salem facility is limited to the operations of the Greensboro Shops, Greensboro, North Carolina.

Except as set forth below and in the exhibits hereto, neither facility used, purchased, stored, treated, disposed, transported or otherwise handled hazardous substances or materials which may have been transported to the CCCI site by the Richmond facility or the Greensboro Shops during the period 1970 to 1985:

Ammonium persulfate was used at the Greensboro Shops and the Richmond facility to etch copper in the manufacture of printed circuit boards. CCCI and CCC picked up spent ammonium persulfate solution from the Greensboro Shops and the Richmond facility for reclamation of the copper content at the CCCI site and their St. Louis, Missouri location. Although the chemical composition of the ammonium persulfate

Page 6

solution varied, it was generally as described in contract No. NC-5612E, submitted as Exhibit R4 to this letter. Shipments from the Greensboro Shops went to the CCCI site from 1972 through August, 1976. Shipments from the Richmond facility went to the CCCI site during 1976. Dates of shipments and information regarding quantities of ammonium persulfate solution shipped are shown on Attachments II and III.

8-12. Financial Responsibility. Western Electric Company, Incorporated, a wholly owned subsidiary of AT&T, changed its name on January 3, 1984 to AT&T Technologies, Inc. Effective December 31, 1989, AT&T Technologies, Inc. (formerly Western Electric) was merged into its parent, AT&T. As part of that merger, AT&T assumed Western Electric's liability, if any, for cleanup of hazardous substances which may have been disposed of at the CCCI Site.

Per agreement with Ms. Mary Fulghum described in paragraph I.D above, AT&T's most recent annual report to shareholders was submitted to you under cover of my letter of February 28, 1990.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Helmstetter", written in a cursive style.

CHH:nrl

cc: Ms. Mary Fulghum (without enclosures)

AFFIDAVIT

Judy McCarthy, being first duly sworn, on information and belief, states as follows:

My name is Judy McCarthy. I am an environmental engineer for American Telephone and Telegraph Company ("AT&T"). This affidavit refers to, and incorporates by reference, the March 15, 1990 letter from Carl H. Helmstetter to Ruth Mancos in supplemental response to EPA's request for information regarding the Conservation Chemical Company of Illinois site in Gary, Indiana (CCCI site).

I have been told that record searches were conducted at AT&T's Richmond Facility and AT&T's Winston-Salem Facility for documents relating to use, purchase, storage, treatment, disposal, transportation or other handling of hazardous substances or materials which may have been transported to the CCCI site during the period 1970 to 1985 by the Richmond Facility and the Greensboro Shops. I have been told that present employees who were considered likely to be able to provide the requested information were contacted.


Judy McCarthy

STATE OF NEW JERSEY)
) ss.
COUNTY OF Union)

Subscribed and sworn to before me, a Notary Public in and for said County and State this 10th day of March, 1990.


Notary Public

My commission Expires:

CAROLYN B. FLORIO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 31, 1990

DOCUMENTS CONSULTED IN PREPARATION OF ANSWERS TO THE
INFORMATION REQUESTS WITH RESPECT TO THE RICHMOND FACILITY

<u>Exh. No.</u>	<u>Description</u>
R1	Letter dated November 14, 1975 from Norman B. Hjersted of Conservation Chemical Company to R. E. Murdaugh of Richmond facility regarding proposal for waste disposal.
R2	April 2, 1976 Approval of Purchase for Contract No. NC-5612-E (Purchase Order No. RVX289965) with Conservation Chemical Company.
R3	Purchase Order No. RVX289965 dated 4/16/76 from the Richmond facility to Conservation Chemical Company, Kansas City, Mo., and Amendment No. 1 dated 9/30/76, for disposal service from January 1, 1976 through December 31, 1976.
R4	Contract No. NC-5612E dated April 16, 1976 between Conservation Chemical Company and the Richmond facility for waste removal and disposal services from January 1, 1976 through December 31, 1976.
R5	June 11, 1976 Revision of Approval of Purchase for Contract No. NC-5612-E eliminating ammonium persulfate from the categories of wastes disposed.
R6	Letter dated August 13, 1976 from Robert L. Phillips of Conservation Chemical Company to E. A. Scarlett of Richmond facility regarding pricing revisions.
R7	November 19, 1976 Amendment No. 1 to Contract No. NC-5612-E cancelling contract with Conservation Chemical Company.
R8	1976 log sheets for waste removal pursuant to Purchase Order No. RVX289965.
R9	Statement dated October 15, 1976 from Conservation Chemical Company to the Richmond facility regarding unpaid invoices.

Invoices, bills of lading, freight bills and disbursement documentation regarding the following waste shipments:

<u>Exh. No.</u>	<u>Inv. No.</u>	<u>Shipment Date(s)</u>	<u>Quantity</u>	<u>Waste Type</u>	<u>B/L No(s).</u>	<u>Destination Indicated on B/L</u>
R10	G10848	2/4/76	10,000 gals.	Ammonium Persulfate	No number 04905 353684/5	St. Louis, MO Gary, IN Fair Oaks, VA
		2/6/76		Ammonium Persulfate	1009 04904 27383/5	St. Louis, MO Gary, IN Fair Oaks, VA
			9,373 gals.			
R11	G10849	2/5/76	8,000 gals.	Ammonium Persulfate	1008 04903 353687/8	St. Louis, MO Gary, IN Fair Oaks, VA

<u>Exh. No.</u>	<u>Inv. No.</u>	<u>Shipment Date(s)</u>	<u>Quantity</u>	<u>Waste Type</u>	<u>B/L No(s).</u>	<u>Destination Indicated on B/L</u>
R12	G10868	3/12/76	9,100 gals.	Ammonium Persulfate	1017 00766/7	Gary, IN Fair Oaks, VA
R13	S3326	5/3/76	10,000 gals.	Ammonium Persulfate	30034/5 1122	St. Louis, MO Gary, IN
R14	S4099	8/17/76	4,800 gals.	Ammonium Persulfate	3315 353783	Gary, IN Fair Oaks, VA

DOCUMENTS CONSULTED IN PREPARATION OF ANSWERS TO THE INFORMATION
REQUESTS WITH RESPECT TO THE WINSTON-SALEM FACILITY (GREENSBORO WORKS)

<u>Exh. No.</u>	<u>Description</u>
G1	Contract No. NC-4610-E dated May 20, 1971 between Conservation Chemical Company and the Winston-Salem facility (Greensboro Works) for disposal of spent ammonium persulfate etchants from May 7, 1971 through April 30, 1972.
G2	Contract No. NC-4833-E dated May 16, 1972 between Conservation Chemical Company and the Winston-Salem facility (Greensboro Works) for disposal of spent ammonium persulfate etchants from May 1, 1972 through April 30, 1973.
G3	June 19, 1973 Approval of Purchase for Contract No. NC-5012-E with Conservation Chemical Company of Illinois.
G4	Contract No. NC-5012-E dated August 9, 1973 between Conservation Chemical Company of Illinois and the Winston-Salem facility (Greensboro Works) for disposal of spent ammonium persulfate etchants from May 1, 1973 through April 30, 1974.
G5	September 11, 1974 Approval of Contract Amendment No. 1 to Contract No. NC-5012-E.
G6	Amendment Number 1 to Contract No. NC-5012-E dated September 26, 1974.
G7	May 27, 1974 Approval of Purchase for Contract No. NC-5321-E with Conservation Chemical Company of Illinois.
G8	August 30, 1974 Revision of May 27, 1974 Approval of Purchase for Contract No. NC-5321-E.
G9	Contract No. NC-5321-E dated September 10, 1974 between Conservation Chemical Company of Illinois and the Winston-Salem facility (Greensboro Works) for disposal of spent ammonium persulfate etchants from May 1, 1974 through April 30, 1975.
G10	Amendment Number 1 to Contract No. NC-5321-E dated June 11, 1975 extending period of performance through April 30, 1976.
G11	May 7, 1976 Approval of Contract Amendment No. 2 to Contract No. NC-5321-E.
G12	Amendment Number 2 to Contract No. NC-5321-E dated May 14, 1976 extending period of performance through August 31, 1976.
G13	October 6, 1975 letter from Norman B. Hjersted of Conservation Chemical Company to W. R. Whiteheart of Western Electric Company, Inc. changing destination for Contract NC-5321-E from Gary, Indiana to St. Louis, Missouri.
G14	April 16, 1976 letter from Joan Miller of Conservation Chemical Company to W. R. Whiteheart of Western Electric Company, Inc. changing destination for Contract NC-5321-E to Gary, Indiana.

Invoices, bills of lading, freight bills and disbursement documentation regarding the following waste shipments:

<u>Exh. No.</u>	<u>Inv. No.</u>	<u>Shipment Date(s)</u>	<u>Quantity</u>	<u>Waste Type</u>	<u>B/L and/or Freight Bill No.</u>	<u>Destination Indicated on B/L and/or Freight Bill</u>
G15	7654	10/31/72	83,500 lbs.	Ammonium Persulfate	12687 (10/18/72)	No B/L; freight bill indicates Gary, IN
G16	7700	11/10/72 11/10/72	35,970 lbs. 33,830 lbs.	Ammonium Persulfate	No B/Ls or freight bills	Destination not indicated
G17	10834	11/13/72 11/21/72 11/21/72 11/21/72 12/1/72	97,800 lbs. 73,900 lbs. 88,500 lbs. 85,500 lbs. 91,900 lbs.	Ammonium Persulfate	13332 13560 13561 13562 13807	No B/Ls; freight bills indicate Gary, IN
G18	10922	12/14/72	98,700 lbs.	Ammonium Persulfate	14102	No B/L; freight bill indicates Gary, IN
G19	G8398	1/13/73	66,920 lbs. 94,060 lbs.	Ammonium Persulfate	14619 14620	No B/Ls; freight bills indicate Gary, IN
G20	G8437	1/23/72*	76,740 lbs.	Ammonium Persulfate	14809	No B/L; freight bill indicates Gary, IN
G21	G8484	1/30/73	95,500 lbs.	Ammonium Persulfate	14979	No B/L; freight bill indicates Gary, IN
G22	G8527	2/2/73	50,000 lbs. 97,000 lbs.	Ammonium Persulfate	15057 15197	No B/Ls; freight bills indicate Gary, IN
G23	G9397	2/21/73	101,900 lbs.	Ammonium Persulfate	15433	No B/L; freight bill indicates Gary, IN
G24	G9408	3/1/73	93,000 lbs.	Ammonium Persulfate	15618	No B/L; freight bill indicates Gary, IN

*Error on invoice--date should be 1/23/73 per freight bill

<u>Exh. No.</u>	<u>Inv. No.</u>	<u>Shipment Date(s)</u>	<u>Quantity</u>	<u>Waste Type</u>	<u>B/L and/or Freight Bill No.</u>	<u>Destination Indicated on B/L and/or Freight Bill</u>
G25	G9453	3/8/73	86,500 lbs. 72,700 lbs.	Ammonium Persulfate	15785 15784	No B/Ls; freight bills indicate Gary, IN
G26	G9482	3/16/73	88,540 lbs.	Ammonium Persulfate	15980	No B/L; freight bill indicates Gary, IN
G27	G9555	3/26/73 3/29/73	89,700 lbs. 97,000 lbs.	Ammonium Persulfate	16196 16277	No B/Ls; freight bills indicate Gary, IN
G28	G9716	5/10/73	36,320 lbs. 36,620 lbs.	Ammonium Persulfate	30982 30983	Gary, IN Gary, IN
G29	G9897	6/8/73	70,000 lbs.	Ammonium Persulfate	17826	No B/L; freight bill indicates Gary, IN
G30	G8611	3/11/74	45,980 lbs.	Ammonium Persulfate	18580	Gary, IN
G31	G8755	4/4/74	63,000 lbs.	Ammonium Persulfate	18885 23663	Gary, IN
G32	G8754	4/5/74	92,900 lbs.	Ammonium Persulfate	18886 23693	Gary, IN
G33	G8756	4/17/74	36,460 lbs. (4,097 gals)	Ammonium Persulfate	18778	Gary, IN
G34	G8757	4/17/74	39,500 lbs.	Ammonium Persulfate	18781	Gary, IN
G35	G8834	5/22/74	39,040 lbs.	Ammonium Persulfate	19045	Gary, IN
G36	G8845	5/25/74	44,060 lbs.	Ammonium Persulfate	19068	Gary, IN
G37	G8927	6/3/74	89,400 lbs.	Ammonium Persulfate	19305	Gary, IN
G38	G8928	6/13/74	93,700 lbs.	Ammonium Persulfate	19306	Gary, IN
G39	G8996	Additional billing on previous invoices (G8834, G8845, G8928, G8927)				

<u>Exh. No.</u>	<u>Inv. No.</u>	<u>Shipment Date(s)</u>	<u>Quantity</u>	<u>Waste Type</u>	<u>B/L and/or Freight Bill No.</u>	<u>Destination Indicated on B/L and/or Freight Bill</u>
G40	G8966	7/1/74	75,300 lbs.	Ammonium Persulfate	19382 24930	Gary, IN
G41	G8988	7/1/74	60,780 lbs.	Ammonium Persulfate	19412 24813	Gary, IN
G42	G8999	7/8/74	71,900 lbs.	Ammonium Persulfate	19451 1044	Gary, IN
G43	G9017	7/16/74	97,000 lbs.	Ammonium Persulfate	19484 1169	Gary, IN
G44	G9064	8/1/74	92,000 lbs.	Ammonium Persulfate	19636 1391	Gary, IN
G45	G9152	8/15/74	70,800 lbs.	Ammonium Persulfate	19911 1586	Gary, IN
G46	G9240	8/28/74	69,800 lbs.	Ammonium Persulfate	20117 2002	Gary, IN
G47	G9178	9/11/74	83,800 lbs.	Ammonium Persulfate	19943 2002	Gary, IN
G48	G9241	9/19/74	58,900 lbs.	Ammonium Persulfate	20116 2140	Gary, IN
G49	G9362	11/11/74	85,800 lbs.	Ammonium Persulfate	20359 2970	Gary, IN
G50	G9448	12/5/74	91,300 lbs.	Ammonium Persulfate	20525 3342	Gary, IN
G51	G9565	2/1/75	91,700 lbs.	Ammonium Persulfate	20730 3837	Gary, IN
G52	G9692	2/28/75	86,100 lbs.	Ammonium Persulfate	21022 4262	Gary, IN
G53	G9754	3/25/75	65,400 lbs.	Ammonium Persulfate	21109 4616	Gary, IN
G54	G9860	5/14/75	68,800 lbs.	Ammonium Persulfate	21400 5277	Gary, IN
G55	G9909	5/19/75	52,800 lbs. (estimated)	Ammonium Persulfate	21455 5335	Gary, IN

<u>Exh. No.</u>	<u>Inv. No.</u>	<u>Shipment Date(s)</u>	<u>Quantity</u>	<u>Waste Type</u>	<u>B/L and/or Freight Bill No.</u>	<u>Destination Indicated on B/L and/or Freight Bill</u>
G56	G10123	7/14/75	90,100 lbs.	Ammonium Persulfate	21684 6142	Gary, IN
G57	G10322	9/9/75	67,100 lbs.	Ammonium Persulfate	22074 7021	Gary, IN
G58	G10965 G10847	3/8/76	65,980 lbs.	Ammonium Persulfate	9457	No B/L; freight bill indicates Gary, IN
G59	S4073	8/4/76	71,200 lbs.	Ammonium Persulfate	11997	No B/L; freight bill indicates Gary, IN
G60	G11265	8/27/76	26,700 lbs. (3,000 gals.)	Ammonium Persulfate	465508	Gary, IN